



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

MAY 31 2007

VIA FEDEX

Mr. John Campbell, Director
NASA Wallops Island
Mill Dam Road
Wallops Island, VA 23337

Re: Notice of Violation
Compliance Evaluation Inspection
February 27, 2007
EPA ID No. VA8800010763

Docket No.: R3-07-NOV-RCRA-024

Dear Mr. Campbell:

On February 27, 2007, the U.S. Environmental Protection Agency, Region III ("EPA") conducted a Compliance Evaluation Inspection ("CEI") of your facility in Wallops Island, VA. under the federally authorized Commonwealth of Virginia Hazardous Waste Management Regulations ("VAHWMR") and the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. Sections 6901 et seq. The Inspection Report is attached to this letter. Based on the inspection, EPA has determined that the National Aeronautics and Space Administration (NASA or the Facility) has violated regulations under VAHWMR and RCRA. As a result of this determination, EPA is issuing this Notice of Violation ("NOV"). The specific violation(s) are:

1. The inspector noted the date on one container in building B29 had an illegible date marked on it in violation of 9 VAC 20-60-262 [40 CFR 262.34(a)(2)] which requires dates to be "clearly marked and visible for inspection".
2. The inspector observed both in building F16 (Photo #33) and the National Oceanic and Atmospheric Administration (NOAA) facility (Photo #48) containers of universal waste were not dated as required by 9 VAC 20-60-273 [40 CFR 273.15(c)(1)]. Production of shipping records to demonstrate the wastes were in storage less than a year does not meet the requirements for an inventory system allowed in 9 VAC 20-60-273 [40 CFR 273.15(c)(3&4)].

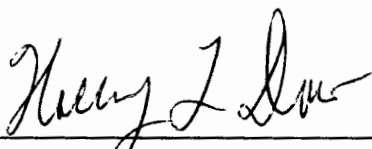
Within twenty (20) calendar days of the receipt of this NOV, please submit a response documenting the measures the Facility has taken or is taking to achieve compliance with the violations noted above or provide an explanation of facts and circumstances that cause you to

believe that EPA's determination of the alleged violations are in error. If the compliance measures identified are planned or are on-going, please provide a schedule for when the compliance measures will be completed.

Section 3008(a) of RCRA authorizes EPA to take an enforcement action whenever it is determined that any person has violated, or is in violation, of any requirement of RCRA as amended. Such an action could include a penalty of up to \$32,500 per day of violation. In addition, failure to achieve and maintain compliance with the regulations cited in this Notice of Violation may be treated as a repeated offense and may constitute a "knowing" violation of Federal law.

This Notice of Violation is not intended to address all past violations, nor does it preclude EPA from including any ongoing, including the one cited in this letter, or past violations in any future enforcement action. Response to this NOV shall be addressed to:

Kenneth J. Cox
Waste and Chemicals Management Division (3WC31)
U.S. Environmental Protection Agency - Region III
1650 Arch Street
Philadelphia, PA 19103#



Harry T. Daw
Associate Director
Office of Enforcement
Waste and Chemicals Management Division

5/29/07
Date

Enclosure

cc: Steve Fraizier (VADEQ) with Enclosure
Terry DiFiore (3WC31) w/o Enclosure
Ken Cox (3WC31) w/o Enclosure ✓

CONCURRENCES							
SYMBOL	3WC31	3WC31					
SURNAME	<i>SPK</i>	<i>Amend</i>					
DATE	<i>5/25/07</i>	<i>5/25/07</i>					

National Aeronautics and
Space Administration
Goddard Space Flight Center
Wallops Flight Facility
Wallops Island, VA 23337-5099



June 19, 2007

Reply to Attn of: 250.W

Waste and Chemicals Management Division (3WC31)
Attn: Mr. Kenneth J. Cox
Compliance Officer
U. S. Environmental Protection Agency - Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Subject: Notice of Violation, Compliance Evaluation Inspection held
February 27, 2007, EPA ID No. VA8800010763,
Docket No.: R3-07-NOV-RCRA-024

Ref: EPA ltr. from H. Daw to J. Campbell, dtd. 5/31/07

The NASA Goddard Space Flight Center's Wallops Flight Facility (WFF) is in receipt of the United States Environmental Protection Agency's (EPA) Notice of Violation (NOV) dated May 31, 2007, from the inspection held on February 27 - March 1, 2007. In that letter, EPA cites two specific "violations" that WFF was able to immediately remediate during the inspection. The missing or illegible labels cited in the NOV were immediately corrected and records were presented to the inspector which demonstrated that the universal waste items were held for less than 1 year. NASA is confident that these findings and our subsequent best management practices will improve the environmental program at WFF.

As a result of your inspection, WFF will implement the following best management practices.

- NASA is reviewing the less-than-90-day accumulation area inspection requirements with its hazardous waste inspectors to ensure that particular attention is given to the legibility of hazardous waste labels.
- NASA will review the contents of this NOV with all WFF satellite accumulation area point-of-contact personnel by June 30, 2007. All findings from the EPA inspection will be incorporated into successive hazardous waste training sessions.
- The National Oceanic and Atmospheric Administration (NOAA) has affixed a metal plate to the wooden crate housing the universal waste fluorescent tubes (Enclosure 1). This plate will provide a more adherent surface on which to bond the accumulation start date labels.

- NASA will instruct its building inspectors to examine both hazardous waste labels and universal waste accumulation start date labels for legibility, completeness, and start date expiration. Accumulation start dates in excess of 9 months will be reported to the hazardous waste manager.

The May 31, 2007, letter referenced previously indicates that WFF should "provide an explanation of facts and circumstances that cause [it] to believe that EPA's determination of the alleged violations [were] in error." Although WFF does not dispute that there were minor errors uncovered during the inspection, it respectfully submits that the facts and circumstances associated with the alleged violations are such that the NOV dated May 31, 2007, should be removed from WFF's permanent record. A brief explanation of those facts and circumstances follows.

The first violation refers to a container in Building B-29 with an illegible date. The inspector's report states, "The date on one label was illegible but that was corrected immediately." NASA believes that the label could be read well enough to be corrected immediately; therefore, the dates were clearly marked and visible for inspection in accordance with 40 CFR 262.34(a)(2). However, this cannot be confirmed because this discrepancy was not highlighted or photographed during the inspection.

The second violation concerns universal waste labels with questionable accumulation start dates at two different locations. In one instance, the universal waste container at the NOAA facility lacked an accumulation start date. This container had been properly labeled with a dated adhesive sticker, but humid and dusty conditions associated with construction activities caused the sticker to peel away from the wooden crate. It is suspected that cleaning personnel mistakenly swept up the label.

In the second instance a universal waste label on a container in Building F-16 was dated with an accumulation start date of February 8, 2006. Discussions with operating personnel revealed that this date should have been February 8, 2007. However, the operator inadvertently wrote the year 2006 instead of 2007.

In both cases, the WFF Hazardous Waste Manager was able to satisfy the EPA inspector that the universal waste had not accumulated for greater than 1 year. Documentation, through the use of shipping records and hazardous waste disposal inventory forms (Enclosure 2), validated the proper universal start date. As a small quantity handler of universal waste, WFF submits that Enclosure 2 demonstrates that WFF complied with the requirements of 40 CFR 273.15.

NASA will consistently strive to improve its waste management practices through cooperative guidance offered by EPA.

If you should have any questions or require further clarification, please contact Mr. Joel T. Mitchell at (757) 824-1127.



John H. Campbell
Director of Wallops Flight Facility

2 Enclosures

cc: (w/o encl.)

140/Mr. D. Hymer

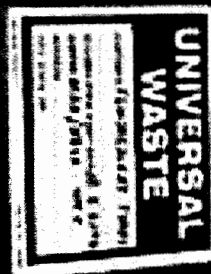
200/Ms. C. Masey

250/Mr. A. Lopez

HQ/Environmental Management Division/Mr. J. Leatherwood

NOAA/Mr. V. Crawford

DEQ/Ms. L. Silvia



EPA Hazardous Waste Inspection
February 27 – March 1, 2007

NASA is confident that the universal waste fluorescent tubes at the National Oceanic and Atmospheric Administration (NOAA) facility and the universal waste batteries at Building F-16 observed by the United States Environmental Protection Agency (EPA) inspector on February 27, 2007, were on site for less than one year.

On October 12, 2006, fluorescent tubes were picked up from NOAA by Wallops Flight Facility (WFF) personnel. According to Attachment 1, the tubes were packed in two tube boxes and one rectangular box. On November 7, 2006, these tubes were transported to Veolia ES Technical Solutions, Philadelphia, Pennsylvania, by Dart Trucking for bulking, prior to recycling, as stated on shipping document ZZ00033353, line 2 and line 3. (Attachment 2). The packing summary (Attachment 3), for line 2 and line 3, describes the containers types as "4-Foot-DF" and "301G-DF," respectively. These container types are consistent with the two tube boxes and one rectangular box described above.

Since NOAA has one universal waste site for fluorescent tubes, the accumulation start date on the NOAA container discussed in the second violation of the Notice of Violation (NOV) would be no earlier than October 12, 2006.

The universal waste battery container observed at Building F-16 was emptied by WFF personnel on November 24, 2006, (Attachment 4) and February 8, 2007, (Attachment 5). The lead acid batteries from these containers were transported by Dart Trucking on January 23, 2007, via shipping document ZZ00032905 (Attachment 6) and on April 10, 2007, via shipping document ZZ00033317 (Attachment 7), respectively. In both cases the lead acid batteries were delivered to Veolia ES Technical Solutions, Philadelphia, Pennsylvania, for bulking prior to recycling. The nickel cadmium batteries will leave WFF on June 26, 2007.

Therefore, the accumulation start date on the Building F-16 container discussed in the second violation of the Notice of Violation (NOV) would be no earlier than February 8, 2007. The February 8, 2006, date observed on the container was written in error in much the same way as one often misdates the year on checks at the beginning of the year.

Regulation 9 VAC 20-60-273 [40 CFR 273.15(c)(6)] allows for "any other method which clearly demonstrates the length of time that universal waste has been accumulated from the date it becomes a waste or is received." Thus, the universal waste fluorescent tubes observed by the EPA inspector on February 27, 2007, could not have been accumulated prior to October 12, 2006 and the universal waste batteries observed by the EPA inspector on February 27, 2007, could not have been accumulated prior to February 8, 2007. In both cases, hazardous waste disposal inventory forms, packing lists, and shipping records document that the universal waste had not accumulated for greater than one year.

HAZARDOUS WASTE DISPOSAL INVENTORY

Site: Greenbelt ☐ Wallops Main Base (EPA ID# VA88800010763) ☐ Wallops Island (EPA ID# VA78000020888) ☐

GENERATOR INFORMATION

Date:	Sheet 1 of 1	1. Containers shall be COMPATIBLE. 2. Containers shall be CLOSED. 3. Containers shall be LABELED. 4. Waste materials shall NOT be mixed.
Name: <u>Gregg Frostrom</u>	Code	
Phone	Bldg. <u>NOAA</u> Room	

WASTE INVENTORY

ITEM	WASTE DESCRIPTION <i>Describe material to be collected by its specific chemical constituents or by trade name.</i>	GENERATING PROCESS <i>Describe the work process that made the waste, e.g., expired shelf life, cleaning paint brushes.</i>	CONTAINERS <i>Type — Describe type, e.g., drum, plastic bottle, sealed bucket, etc.</i>			STATE <i>Check appropriate block.</i>			WASTE TRAIT <i>Insert appropriate code.</i>	
			No.	Size	Type	Gas	Liq	Solid	Trait	Code
160 161 1.	Flourescent tubes	expired	3	tube boxes		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	T	CA – Corrosive Acid (pH<2) CB – Corrosive Base (pH>12.5) F – Flammable (Flashpoint < 140F) NR – Non-Regulated Ox – Oxidizer Px – Peroxide R – Reactive (H ₂ O, air, or otherwise sensitive) T – Toxic Other (Specify)
2.	"	expired	1	rectangular box		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	T	
3.						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
4.						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
5.						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
6.						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
7.						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
8.						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
9.						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
10.						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
11.						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
12.						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

GENERATOR COMMENTS

Have you received Resource Conservation and Recovery Act (RCRA) generator training within the last 12 months? ☒ Yes ☐ No
 Have you made a good faith effort to minimize your waste generation by considering substitutes or alternatives? ☒ Yes ☐ No

Comments. Indicate special requirements (if any) for collection of the waste material, e.g., restricted access to an area, appointment needed, generator wishes to monitor collection, etc.

Environmental Office Use

Date received: 10/12/06
 Date collected: 10/12/06
 Initials: WJF/SW

GENERATOR CERTIFICATION

I hereby declare that the contents of this inventory are fully and accurately stated as described by their waste, process, and container parameters.

Printed Name Gregg Frostrom Signature Gregg W. Frostrom Date 10/12/06

At Greenbelt, when ready for pickup, you may e-mail the completed form by calling 6-9233 for an e-mail address, or fax it to 6-0368. Coordinate waste pickup by dialing 6-9233.
 At Wallops, when ready for pickup, e-mail completed form to wffhazw@pop200.gsfc.nasa.gov or fax it to x1819. Coordinate waste pickup by dialing x1718.



SHIPPING DOCUMENT		1. Generator ID Number V A 8 0 0 0 1 0 7 6 3	2. Page 1 of 1	3. Emergency Response Phone (800) 535-5053	4. Shipping Document Tracking Number ZZ 00033353			
5. Generator's Name and Mailing Address NASA/GSEC WALLOPS FLIGHT FAC MAIN BASE FACILITY BLDG F100 MAIL CODE 250 W WALLOPS ISLAND, VA 23337					Generator's Site Address (if different than mailing address) SAME			
Generator's Phone: 757 524-2127								
6. Transporter 1 Company Name VEOLIA ES TECHNICAL SOLUTIONS					U.S. EPA ID Number N J D 0 8 0 6 3 1 3 6 9			
7. Transporter 2 Company Name Environmental Transport Corp Inc.					U.S. EPA ID Number AK10000092061			
8. Designated Facility Name and Site Address VEOLIA ES TECHNICAL SOLUTIONS LLC 3100 HEDLEY STREET PHILADELPHIA, PA 19137					U.S. EPA ID Number P A D 0 8 1 0 4 5 1 5 7			
Facility's Phone: 800 423-2382								
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Codes	
			No.	Type				
	X	BATTERIES, WET, FILLED WITH ALKALI, ELECTRIC STORAGE, 8, UN2795, III	0 0 1	D F	0 0 2 4 0	P	NONE	
		2) FLUORESCENT TUBES, DESTINED FOR RECYCLING, NONE, NONE	0 0 2	D F	0 0 1 1 0	P	NONE	
		3) FLUORESCENT TUBES, DESTINED FOR RECYCLING, NONE, NONE	0 0 1	D F	0 0 0 2 5	P	NONE	
	4.							
14. Special Handling Instructions and Additional Information 1) ERG:154 A:GRT247384PA NICAD BATT 2) A:GRT247434PA FLUORESCENT LAMP TUBES 25/BOX 3) A:GRT247434PA-U FLUORESCENT U-TUBES 25/BOX -I- INFOTRAC ACCOUNT #86072 <i>Rec'd 11/10/06 at Veolia 3100 Hedley St. Phila Pa 19137 Duane E Gay</i>								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.								
Generator's/Offoror's Printed/Typed Name Joel Mitchell					Signature <i>Joel T. Mitchell</i>		Month Day Year 11 10 06	
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____							
	17. Transporter Acknowledgment of Receipt of Shipment							
	Transporter 1 Printed/Typed Name Ray Kewer					Signature <i>Ray Kewer</i>		Month Day Year 11 10 06
	Transporter 2 Printed/Typed Name Richard Wellins					Signature <i>Richard Wellins</i>		Month Day Year 11 10 06
DESIGNATED FACILITY	18. Discrepancy							
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
	Shipping Document Tracking Number: _____							
	18b. Alternate Facility (or Generator) U.S. EPA ID Number _____							
	Facility's Phone: _____							
	18c. Signature of Alternate Facility (or Generator) _____ Month Day Year _____							
19. Report Management Method Codes (i.e., codes for treatment, disposal, and recycling systems)								
1.		2.		3.		4.		
20. Designated Facility Owner or Operator: Certification of receipt of shipment except as noted in Item 18a								
Printed/Typed Name Stan Davis					Signature <i>Stan Davis</i>		Month Day Year 11 10 06	

DESIGNATED FACILITY TO GENERATOR

PACKING SUMMARY

Generator Number: 437350 Manifest Number: ZZ00033353
 NASA/GSFC Wallops Flight Facility
 Main Base Facility
 Wallops Island, VA 20387
 Field System ID: PS
 Work Order Number: 0743640004
 Date Shipped: 11/06/2006
 Attn: MARIANNE SIMKO (CONTACT PAPER)
 EPA ID: VA8800010763

Container#: PS-0743640004-003 Waste Area: Manifest Page/Line: 01 / 1
 Wt.: 402477 Disposal Code: GRT247364PA PHY State: S
 Date Accumulated: 11/06/2006 Gen Drum ID:
 Shipping Name: BATTERIES, WET, FILLED WITH ALKALI, ELECTRIC STORAGE, 9 UN2795, III
 No. of Components: 01 Outer Container: 301G-DF Inner Container:
 Primary Waste Codes: NONE PCB Serial #: OOS Date: / /
 Total Gross Wt.: 240.0 SIC: 9881 Source: G16 Form: W909 System: H141 Cubic Ft.: 4.09
 Individual Component Weights: 1 @ 240 (POUNDS)

Units	Container Size	Net Weight	Chemical Name	EPA/State Codes
1	30 GAL		NICKEL CADMIUM BATTERIES (100%)	NONE

Container#: PS-0743640004-001 Waste Area: Manifest Page/Line: 01 / 2
 Wt.: 555850 Disposal Code: GRT247364PA PHY State: S
 Date Accumulated: 11/06/2006 Gen Drum ID:
 Shipping Name: FLUORESCENT TUBES, DESTINED FOR RECYCLING, NONE, NONE
 No. of Components: 02 Outer Container: 4 FOOT-DF Inner Container:
 Primary Waste Codes: NONE PCB Serial #: OOS Date: / /
 Total Gross Wt.: 110 SIC: 9881 Source: G11 Form: W919 System: H010 Cubic Ft.: 5.00
 Individual Component Weights: 55.55 (POUNDS)

Units	Container Size	Net Weight	Chemical Name	EPA/State Codes
1	154QM		FLUORESCENT LAMP TUBES (100%)	NONE

Container#: PS-0743640004-002 Waste Area: Manifest Page/Line: 01 / 3
 Wt.: 555650 Disposal Code: GRT247364PA-U PHY State: S
 Date Accumulated: 11/06/2006 Gen Drum ID:
 Shipping Name: FLUORESCENT TUBES, DESTINED FOR RECYCLING, NONE, NONE
 No. of Components: 01 Outer Container: 301G-DF Inner Container:
 Primary Waste Codes: NONE PCB Serial #: OOS Date: / /
 Total Gross Wt.: 25 SIC: 9881 Source: G11 Form: W919 System: H010 Cubic Ft.: 0.00
 Individual Component Weights: 1 @ 25 (POUNDS)

Units	Container Size	Net Weight	Chemical Name	EPA/State Codes
1	30 GAL		FLUORESCENT LAMP TUBES (100%)	NONE

HAZARDOUS WASTE DISPOSAL INVENTORY

Site: Greenbelt ☐ Wallops Main Base (EPA ID# VA88800010763) ☐ Wallops Island (EPA ID# VA78000020888) ☐

GENERATOR INFORMATION

Date: <u>11/24/06</u>	Sheet <u>1</u> of <u>1</u>	1. Containers shall be COMPATIBLE. 2. Containers shall be CLOSED. 3. Containers shall be LABELED. 4. Waste materials shall NOT be mixed.
Name:	Code <u>228</u>	
Phone	Bldg. <u>Elec Shop F-16</u> Room	

WASTE INVENTORY

ITEM	WASTE DESCRIPTION <i>Describe material to be collected by its specific chemical constituents or by trade name.</i>	GENERATING PROCESS <i>Describe the work process that made the waste, e.g., expired shelf life, cleaning paint brushes.</i>	CONTAINERS <i>Type — Describe type, e.g., drum, plastic bottle, sealed bucket, etc.</i>			STATE <i>Check appropriate block.</i>			WASTE TRAIT <i>Insert appropriate code.</i>	
			No.	Size	Type	Gas	Liq	Solid	Trait	Code
299	1. Florescent tubes crushed	Univ waste	1	55		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	T/NR	CA – Corrosive Acid (pH<2) CB – Corrosive Base (pH>12.5) F – Flammable (Flashpoint < 140F) NR – Non-Regulated Ox – Oxidizer Px – Peroxide R – Reactive (H ₂ O, air, or otherwise sensitive) T – Toxic Other (Specify)
	2. Alkaline batteries		6			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NR	
	3. lead acid batteries		6			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	CA/NR	
302	4. Ni-Cd batteries		1			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CB/NR	
	5.					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	6.					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	7.					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	8.					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	9.					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	10.					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	11.					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	12.					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

GENERATOR COMMENTS

Have you received Resource Conservation and Recovery Act (RCRA) generator training within the last 12 months? ☒ Yes ☐ No
 Have you made a good faith effort to minimize your waste generation by considering substitutes or alternatives? ☒ Yes ☐ No

Comments. Indicate special requirements (if any) for collection of the waste material, e.g., restricted access to an area, appointment needed, generator wishes to monitor collection, etc.

Environmental Office Use

Date received: 11/24/06
 Date collected: 11/24/06
 Initials: MTS/SW

GENERATOR CERTIFICATION

I hereby declare that the contents of this inventory are fully and accurately stated as described by their waste, process, and container parameters.

Printed Name Sandra Phipps Signature Sandra Phipps Date 11/24/06

At Greenbelt, when ready for pickup, you may e-mail the completed form by calling 6-9233 for an e-mail address, or fax it to 6-0368. Coordinate waste pickup by dialing 6-9233.
 At Wallops, when ready for pickup, e-mail completed form to wffnazw@pop200.gsfc.nasa.gov or fax it to x1819. Coordinate waste pickup by dialing x1718.

HAZARDOUS WASTE DISPOSAL INVENTORY

Site: Greenbelt ☐ Wallops Main Base (EPA ID# VA88800010763) ☐ Wallops Island (EPA ID# VA78000020888) ☐

GENERATOR INFORMATION

Date: <u>2/8/07</u>	Sheet <u>1</u> of <u>1</u>	1. Containers shall be COMPATIBLE. 2. Containers shall be CLOSED. 3. Containers shall be LABELED. 4. Waste materials shall NOT be mixed.
Name:	Code <u>228</u>	
Phone	Bldg. <u>F-16 ELEC</u> Room	

WASTE INVENTORY

ITEM	WASTE DESCRIPTION <i>Describe material to be collected by its specific chemical constituents or by trade name.</i>	GENERATING PROCESS <i>Describe the work process that made the waste, e.g., expired shelf life, cleaning paint brushes.</i>	CONTAINERS <i>Type — Describe type, e.g., drum, plastic bottle, sealed bucket, etc.</i>			STATE <i>Check appropriate block.</i>			WASTE TRAIT <i>Insert appropriate code.</i>	
			No.	Size	Type	Gas	Liq	Solid	Trait	Code
350 1.	Lead acid batteries	expired	20			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CAT	CA – Corrosive Acid (pH<2) CB – Corrosive Base (pH>12.5) F – Flammable (Flashpoint < 140F) NR – Non-Regulated Ox – Oxidizer Px – Peroxide R – Reactive (H ₂ O, air, or otherwise sensitive) T – Toxic Other (Specify)
2.	oily rags	prev. main	1	bag		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NR	
390 3.	Ni-cad battery	expired	1			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CBT	
4.						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
5.						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
6.						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
7.						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
8.						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
9.						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
10.						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
11.						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
12.						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

GENERATOR COMMENTS

Have you received Resource Conservation and Recovery Act (RCRA) generator training within the last 12 months? ☒ Yes ☐ No
 Have you made a good faith effort to minimize your waste generation by considering substitutes or alternatives? ☒ Yes ☐ No

Comments. Indicate special requirements (if any) for collection of the waste material, e.g., restricted access to an area, appointment needed, generator wishes to monitor collection, etc.

Environmental Office Use

Date received: 2/8/07
 Date collected: 2/8/07
 Initials: LLB

GENERATOR CERTIFICATION

I hereby declare that the contents of this inventory are fully and accurately stated as described by their waste, process, and container parameters.

Printed Name

Signature [Signature]

Date 2/8/07

At Greenbelt, when ready for pickup, you may e-mail the completed form by calling 6-9233 for an e-mail address, or fax it to 6-0368. Coordinate waste pickup by dialing 6-9233.
 At Wallops, when ready for pickup, e-mail completed form to wffhazw@pop200.gsfc.nasa.gov or fax it to x1819. Coordinate waste pickup by dialing x1718.



SHIPPING DOCUMENT		1. Generator ID Number V A 8 8 0 0 0 1 0 7 8 3	2. Page 1 of 1	3. Emergency Response Phone (800) 535-5053	4. Shipping Document Tracking Number ZZ 00032905		
5. Generator's Name and Mailing Address NASA/GSFC WALLOPS FLIGHT FAC MAIN BASE FACILITY BLDG F180 MAIL CODE 250.W WALLOPS ISLAND, VA 23337					Generator's Site Address (if different than mailing address) NONE		
Generator's Phone: 757 824-2127							
6. Transporter 1 Company Name VEOLIA ES TECHNICAL SOLUTIONS					U.S. EPA ID Number N J 0 0 6 0 8 3 1 3 6 9		
7. Transporter 2 Company Name Dart Trucking Company Inc.					U.S. EPA ID Number 04D00986525		
8. Designated Facility Name and Site Address VEOLIA ES TECHNICAL SOLUTIONS L.L.C. 3100 HEDLEY STREET PHILADELPHIA, PA 19137					U.S. EPA ID Number P A D 9 8 1 9 4 5 1 5 7		
Facility's Phone: 800 423-2362							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Codes
	X	1. BATTERIES, WET, FILLED WITH ACID, 8, UN2794, III	0 0 1	D F	0 0 2 4 0	P	NONE
	X	2. LITHIUM BATTERY, 9, UN3000, II	0 0 1	D F	0 0 0 1 0	P	NONE
		3.					
		4.					
14. Special Handling Instructions and Additional Information BATT. -I- INFOTRAC ACCOUNT #86072 1) ERG:154 A:GRT247361PA LEAD ACID BATT 2) ERG:138 A:GRT320267 LITHIUM <i>Rec'd 1/25/07 Veolia 3100 Hedley ST Phila PA 19137 Christopher C Davis</i>							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.							
Generator's/Offoror's Printed/Typed Name Joel Mitchell					Signature <i>Joel Mitchell</i>		Month Day Year 0 1 23 0 7
INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____						
	Transporter signature (for exports only): _____						
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Shipment						
	Transporter 1 Printed/Typed Name Ron KELLER		Signature <i>Ron Keller</i>		Month Day Year 1 23 07		
	Transporter 2 Printed/Typed Name Dennis W COURT		Signature <i>Dennis W Court</i>		Month Day Year 1 25 07		
DESIGNATED FACILITY	18. Discrepancy						
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	Shipping Document Tracking Number: _____						
	18b. Alternate Facility (or Generator) U.S. EPA ID Number _____						
	Facility's Phone: _____						
	18c. Signature of Alternate Facility (or Generator) _____ Month Day Year _____						
	19. Report Management Method Codes (i.e., codes for treatment, disposal, and recycling systems)						
	1. _____	2. _____	3. _____	4. _____			
	20. Designated Facility Owner or Operator: Certification of receipt of shipment except as noted in Item 18a						
	Printed/Typed Name Deayne E Gay SR.		Signature <i>Deayne E Gay</i>		Month Day Year 01 23 07		



SHIPPING DOCUMENT		1. Generator ID Number VA8800010763	2. Page 1 of 1	3. Emergency Response Phone (800) 535-5053	4. Shipping Document Tracking Number ZZ 00033317		
5. Generator's Name and Mailing Address NASA/GSFC WOLLOPS FLIGHT FAC MAIN BASE FACILITY BLDG F180 MAIL CODE 250.W WOLLOPS ISLAND, VA 23337					Generator's Site Address (if different than mailing address) SAME		
Generator's Phone: 757 824-2127							
6. Transporter 1 Company Name DART TRUCKING COMPANY, INC.					U.S. EPA ID Number OH0009865825		
7. Transporter 2 Company Name					U.S. EPA ID Number		
8. Designated Facility Name and Site Address VEOLIA ES TECHNICAL SOLUTIONS, LLC 3100 HEDLEY STREET PHILADELPHIA, PA 19137					U.S. EPA ID Number PAD981945157		
Facility's Phone: 800 423-2362							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Codes
			No.	Type			
	X	BATTERIES, WET, FILLED WITH ACID, 8, UN2794, III	004	CF	03500	P	NONE
		ALKALINE BATTERIES, DOT NON-REGULATED, NONE, NONE	001	DF	00240	P	NONE
14. Special Handling Instructions and Additional Information INFOTRAC ACCOUNT #68072 1) ERG:154 A:GRT247361PA LEAD ACID BATT 2) A:GRT247365PA DRYCELL BATT + <i>Rec'd 4/11/07 At Veolia 3100 Hedley St. Phila Pa 19137 Deane E Gay</i>							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.							
Generator's/Offoror's Printed/Typed Name Joel Mitchell					Signature <i>Joel Mitchell</i>		Month Day Year 6 4 1 0 0 7
INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____						
	Transporter signature (for exports only): _____						
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Shipment						
	Transporter 1 Printed/Typed Name Don Rausman					Signature <i>Don Rausman</i>	
DESIGNATED FACILITY	18. Discrepancy						
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	Shipping Document Tracking Number: _____						
	18b. Alternate Facility (or Generator) U.S. EPA ID Number						
	Facility's Phone: _____						
	18c. Signature of Alternate Facility (or Generator)					Month Day Year	
19. Report Management Method Codes (i.e., codes for treatment, disposal, and recycling systems)							
1.		2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of shipment except as noted in Item 18a							
Printed/Typed Name Deane E Gay SR.					Signature <i>Deane E Gay</i>		Month Day Year 10 4 10 0 7

DESIGNATED FACILITY TO GENERATOR